

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

ALISON SCHULTZ, individually, and)
on behalf of all others similarly situated,)

Plaintiff,)

v.)

CASE NO. 5:23-CV-00030-KDB-SCR

PLANET AUTOMOTIVE GROUP, LLC)
and PLANET AUTOMOTIVE GROUP)
HICKORY, LLC,)

Defendant.)

**JOINT MOTION TO EXTEND DEADLINE
FOR PLAINTIFF TO FILE MOVE FOR
CLASS CERTIFICATION**

COMES NOW Plaintiff Alison Schultz (“Plaintiff”), individually and on behalf of others similarly situated, and Defendants Planet Automotive Group, LLC and Planet Automotive Group Hickory, LLC, and state as follows:

1. The current deadline by which Plaintiff is to move for class certification is October 16, 2023. The parties respectfully request that this deadline be extended to December 16, 2023.
2. The parties recently obtained relevant class-related discovery from a third-party after working through an issue with a subpoena to that third-party. In addition, counsel for Plaintiff has been out of the office much of the last month to help with the birth of a new child.
3. Moreover, the parties are currently working cooperatively to obtain deposition dates which will be relevant for class certification.
4. The parties are in agreeance on this extension and extending this deadline will not prejudice any party and will also allow the parties to effectively litigate the case.

WHEREFORE Plaintiff Alison Schultz and Defendants Planet Automotive Group, LLC and Planet Automotive Group Hickory, LLC respectively request that the Court extend the deadline for Plaintiff to move for class certification to December 16, 2023.

BUTSCH ROBERTS & ASSOCIATES LLC

/s/ Christopher E. Roberts

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2023, I caused a true and correct copy of the foregoing notice to be served upon all persons and entities registered and authorized to receive such notice through the Court's Case Management Electronic Case Files (CM/ECF) system.

/s/ Christopher E. Roberts

Christopher E. Roberts